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9		CEDICE COURT FOR THE
10	UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF CALIFORNIA	
11		
12	ASHLEY PARHAM, JANE DOE, and JOHN DOE,) Case No.: 3:24-cv-07191-RFL
13	Plaintiffs,	Assigned to Hon. Rita F. Lin
14	SEAN COMBS, KRISTINA	
15	KHORRAM, SHANE PEARCE, RUBEN VALDEZ, JOHN	MOTION/REQUEST FOR BRIEF CONTINUANCE OF HEARING
16	PELLETIER, ODELL BECKHAM JR., DREW DESBORDES, JACQUELYN,	DATE ON DEFENDANT'S MOTION FOR IMPOSITION OF SANCTIONS.
17	WRIGHT, HELENA HARRIS-SCOTT, 🤇) FOR IMI OSITION OF SAINCTIONS.
18	MATIAS GONZALEZ, BRANDI CUNNINGHAM, JANICE COMBS,	
19	KEITH LUCKS, and JOHN AND JANE DOES 1-10,	
20)
21	Plaintiffs and their counsel, Ariel Mitchell and Shawn R. Perez hereby respectfully	
22	request a brief continuance of the June 17, 2025 hearing on Defendant's Motion for the	
23	Imposition of Sanctions to a date convenient to the Court, but no earlier than June 25,	
24	2025.	
25	This request is based on the attached Declaration of Counsel and the previously	
26	filed Notice of Unavailability of Counsel filed by Ariel Mitchell (Dkt. 43). This request	
27	is being made on the grounds that neither counsel for Plaintiffs is available for hearing on	
28	the date currently set by the Court.	

This request is not made for the purpose of delay, but only to accommodate 1 2 Counsels' prior commitments. Respectfully submitted, 3 Dated: June 2, 2025 /s/ Shawn R. Perez, Esq. SHAWN R. PEREZ, ESQ. Attorney for Plaintiffs 4 5 6 /// 7 /// 8 /// /// 9 10 /// /// 11 12 /// /// 13 /// 14 15 /// /// 16 /// 17 /// 18 19 /// 20 /// /// 21 22 /// 23 /// /// 24 25 /// 26 /// 27 /// /// 28

DECLARATION OF SHAWN R. PEREZ

- I, Shawn R. Perez, Esq., do hereby declare and swear that the following is true and correct and of my own personal knowledge.
- 1. I am one of Plaintiffs' attorneys of record in the above entitled case, duly admitted to appear before this Court.
- 2. On or about May 9, 2025, Defendant Desbordes filed a Motion for Sanctions pursuant to Rule 11. The motion was set for hearing on June 17, 2025. Opposition was due May 23, 2025 and replies by May 30, 2025.
- 3. Both parties have timely filed their respective Response and Reply and the matter is now fully briefed and ready for submission to the Court.
- 4. I am unavailable for hearing on June 17, 2025, due to my appearance in *United States v. Bryan Madriz*, Case No. 24-cr-20088-JTF (WD TN). That case is set for sentencing in Memphis, Tennessee on June 18, 2025 and I will be traveling to Tennessee at the time of the hearing in this case.
- 5. Ariel Mitchell, Esq., lead counsel in this case, has filed a Notice of Unavailability of Counsel for the period of time from June 9, 2025 through June 24, 2025, due to a prepaid, preplanned vacation out of the country.
- 6. Counsel respectfully requests a brief continuance of the hearing in this matter to a date convenient to the Court, but no earlier than June 25, 2025, to accommodate counsel's prior commitments.
 - 7. This request is being made in good faith and not for purposes of delay.
 - 8. Defendant will suffer no prejudice by the brief delay.
- 9. Alternatively, Plaintiffs have no objection to the Court's deciding the motion without the necessity of a hearing.
- 25 Dated: June 2, 2025.
 - Executed this 2nd day of June, 2025, under penalty of perjury at Las Vegas, Nevada

/s/ Shawn R. Perez, Esq. SHAWN R. PEREZ, ESQ Attorney for Plaintiffs

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 2nd day of June, 2025, the undersigned served the foregoing on all counsel herein by causing a true copy thereof to be filed with the Clerk of Court using the CM/ECF system, which was served via electronic transmission by the Clerk of Court pursuant to local order.

Is Shawn R. Perez, Esq.

SHAWN R. PEREZ, ESQ.